

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

JOE HANDS PROMOTIONS, INC.

Plaintiff,

VS.

2516, INC.

d/b/a PAT'S PUB and

Tom Salmons

3884 N.M. Street

Philadelphia, PA 19124

Defendant.

ORDER

AND NOW, this day of , upon consideration of Plaintiffs’

Unopposed Motion For Enlargement of Time To Complete Discovery, it is hereby **ORDERED**

that the Motion is **GRANTED**, and the completion date for discovery is enlarged for 45 days.

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**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

JOE HANDS PROMOTIONS, INC.	:	
Plaintiff,	:	
	:	CIVIL ACTION NO. 02 CV 3518
vs.	:	
	:	
2516, INC.	:	
d/b/a PAT'S PUB and	:	
Tom Salmons	:	
3884 N.M. Street	:	
Philadelphia, PA 19124	:	
Defendant.	:	

**PLAINTIFF'S UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO COMPLETE DISCOVERY**

Plaintiff, by and through counsel, hereby files this motion to enlarge the time for completion of discovery. This motion is based upon the following:

1. Counsel for Plaintiff, Sharon N. Harvey received confirmation that the plaintiff's primary witness was unavailable due to work schedule out of state.
2. The defendant could not conduct the depositions of this witness.
3. Plaintiff is requesting that the Court grant an enlargement of discovery for a 45 days period in order that the witness may become available.
4. Defendant does not oppose this motion.
5. No prior extensions have been granted in this action.

WHEREFORE, Plaintiff prays that discovery is enlarged for 45 days in order that the witness should be available.

Respectfully submitted:

SHARON N. HARVEY, ESQUIRE
HARPER & PAUL
140 West Maplewood Avenue
Philadelphia, PA 19144
(215) 844-4848

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Philadelphia, PA 19124	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I, SHARON N. HARVEY, hereby certify that on January 7, 2002, I served a true and correct copy of Plaintiff's Unopposed Motion For Enlargement of Time to Complete Discovery by regular first class mail to:

SHARON N. HARVEY, ESQUIRE
Attorney for Plaintiff
Joe Hands Promotions
140 West Maplewood Avenue
Philadelphia, PA 19144
(215) 844-4848

